

20 December 2016

Australian Energy Market Commission
PO Box A2449
Sydney South NSW 1235

Lodged online at: www.aemc.gov.au
Project Number: **ERC0195**

Dear Sir/Madam,

Re: The Australian Energy Market Commission (AEMC)'s Transfer Accuracy Rule Change Request Draft Determination (Draft Determination)¹

Thank you for the opportunity to comment on the Australian Energy Market Commission (AEMC)'s Transfer Accuracy Rule Change Request Draft Determination (*Draft Determination*). As an industry-based external dispute resolution scheme, the Energy and Water Ombudsman (Victoria) (EWOV) provides alternative dispute resolution services to Victorian energy and water consumers by receiving, investigating and facilitating the resolution of complaints.

EWOV's comments are based on our experience handling complaints about energy transfer issues. In principle, EWOV supports the AEMC's proposal to improve the process of correcting erroneous transfers and completing delayed transfers. Based on the information in the *Draft Determination*, we agree that the clarification of roles for new and old retailers in an erroneous transfer situation will improve customer experience and increase confidence in the market.

An address standard

EWOV's case receipt indicates that we continue to observe transfer process problems occur when a property address description, its meter number, its National Metering Identifier (NMI) or Meter Installation Registration Number (MIRN) and details in the Market Settlement and Transfer Solution (MSATS), retailer and or distributor systems do not align. We acknowledge the AEMC's comments in the *Draft Determination* that an address standard may not have significant improvements for customers and may only assist a small subset of transfer errors and delays. We do support a data cleanse of MSATS data by the Australian Energy Market Operator (AEMO) as also noted in the *Draft Determination* – given address mismatches continue to result in transfer errors, billing errors and disconnections.

¹Specifically titled: The Australian Energy Market Commission (AEMC)'s Draft Rule Determination on National Electricity Amendment (Improving the accuracy of customer transfers) Rule, National Energy Retail Amendment (Improving the accuracy of customer transfers) Rule and National Gas Amendment (Improving the accuracy of customer transfers) Rule

AEMO data cleanse

If AEMO's data cleanse proceeds, information about the project timeline from AEMO and the AEMC would be beneficial for EWOV, because of the impact this will have on case handling. This will enable us to prepare staff assist customers who may have their addresses updated as a result of the data cleanse and contact EWOV confused or dissatisfied with change.

It will also be important to provide any customers impacted by an address change with easy-to-understand information about the change and its impacts. We believe this would help to prevent customer confusion about which company to contact with queries and disputes if changes result in account issues (e.g. billing, transfer or disconnection). EWOV also suggests that the AEMC and AEMO consider how notification to customers would occur. For example, would AEMO, the distributor or retailer notify a customer of a change and would this notification occur separate to bills.

As noted earlier we observe, via EWOV's case receipt, that problems with the transfer process occur when there is a discrepancy between how a property's address is commonly known and the retailer and/or distributor's information². Because these issues continue to occur and cause complaints, we suggest the AEMC and AEMO consider whether and how the data cleanse may result in some properties being 'corrected' from an address as the property is known as, which has the potential to cause billing errors and transfer issues.

We trust the above comments are helpful. Should you require further information or have any queries, please contact Belinda Sandilands, Senior Research and Communications Advisor, on (03) 8672 4460 or at Belinda.Sandilands@ewov.com.au.

Yours sincerely



Cynthia Gebert
Energy and Water Ombudsman (Victoria)

² For example, a corner site property, sportsground (with multiple street frontages), units or apartment developments, a newly developed site or subdivided site.